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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LIDIA G. JABLONSKI,

Plaintiff,

vs.

WAL-MART STORES, INC.,

Defendant.

Case No. 2:13-cv-01510-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND THE DEADLINES FOR
FILING RESPONSE AND REPLY
TO DISPOSITIVE MOTIONS**

[FIRST REQUEST]

[ECF No. 59]

In compliance with Local Rules 6-1 and 26-4, Plaintiff LIDIA G. JABLONSKI (“Plaintiff”) and Defendant WAL-MART STORES, INC. (“Defendant”), by and through their attorneys of record, stipulate and agree to extend the time period for Plaintiff Lidia

1 Jablonski to file her response to Defendant's Motion for Summary Judgment, which is
 2 currently due on May 27, 2016, to be extended to and including **June 27, 2016**. Further,
 3 parties also stipulate and agree to extend the time period for Defendant to file its reply to
 4 Plaintiff's Response to the Motion for Summary Judgment to and including **August 4, 2016**.
 5 This is the first request for an extension of time.

6 This stipulation is made for good cause, in good faith, and not for purpose of delay.
 7 This stipulation is necessary because counsel for Plaintiff has deadlines in other matters,
 8 including a reply in a state post-conviction supplemental petition for a writ of habeas corpus
 9 due on May 27, 2016, a reply in support of a motion to intervene in *United States v. Bundy*,
 10 *et al.*, Dist. Ct. Case No. 2:16-cr-00046-GMN-PAL due on May 31, 2016, an evidentiary
 11 hearing in a state post-conviction case on June 3, 2016, a hearing on a state post-conviction
 12 supplemental petition for a writ of habeas corpus on June 8, 2016, as well as other deadlines
 13 in state and federal matters. Additionally, counsel for Defendant has an answering brief due
 14 with the United States Court of Appeals for the Ninth Circuit due on July 15, 2016, and has
 15 a planned vacation from July 15, 2016, through July 29, 2016.

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1 This stipulation is also necessary because the parties are engaging in settlement
2 conversation. The normal briefing set forth in Local Rule 7-2 will still be applicable.

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4 Dated: May 20, 2016.

Dated: May 20, 2016.

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Alina M. Shell

/s/ Jamie Chu, Esq.

8 MARGARET A. MCLETCHIE
9 ALINA SHELL
10 MCLETCHIE SHELL LLC

ROGER L. GRANDGENETT II, ESQ.
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LITTLER MENDELSON, P.C.

11
12 Attorneys for Plaintiff
13 LIDIA G. JABLONSKI

Attorneys for Defendant
WAL-MART STORES, INC.

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15 **IT IS SO ORDERED.**

16 Dated this 23rd day of May,
17 2016.

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20 Jennifer A. Dorsey
21 United States District Judge
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